Appl. No. 10/682,252
Amdt. dated September 17, 2010
Reply to Office Action of March 17, 2010
Amendment under 37 CFR 1.114
Request for Continued Examination

PATENT

REMARKS/ARGUMENTS

Status of the Application

Prior to entry of this Amendment, claims 1-37 were pending for examination. An Office Action mailed March 17, 2010 rejected claims 1, 10-13, 21, 24, 26-28, 31, and 33-35 under 35 U.S.C. § 103(a) as being anticipated by U. S. Patent No. 6,985,912 to Mullins et al. (hereinafter "**Mullins**") in view of U.S. Patent No. 6,865,576 to Gong et al. (hereinafter "**Gong**") and further in view of U.S. Patent Pub. No. 2002/0143943 of Lee et al. (hereinafter "**Lee**"); rejected claims 2, 3, 5, 6, 14, 15, 17, 25, 29, 32 and 36 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of Gong, in further view of Lee, and in view of U. S. Patent No. 5,694,598 to Durand et al. (hereinafter "**Durand**"); rejected claims 4, 16, 30, and 37 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of Gong, in further view of Lee, and in further view of U. S. Patent No. 6,085,188 to Bachmann et al. (hereinafter "**Bachmann**"); rejected claims 7-9 and 18-20 under 35 U.S.C.§103(a) as being unpatentable over Mullins in view of Gong, in further view of Lee, and in further view of U. S. Patent No. 5,596,746 to Shen et al. (hereinafter "**Shen**"); and rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over Mullins in view of Gong, in further view of Lee, in further view of Durand, and in further view of Bachmann.

This amendment amends claims 1 and 13 and adds new claim 38. No claims have been canceled. Hence, after entry of this amendment, claims 1-38 will stand pending for examination. Claims 1, 13, 21, 24, and 31 are independent claims. The applicant respectfully requests reconsideration of the pending claims, for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Mullins in view of Gong, in further view of Lee

The Office Action has rejected claims 1, 10-13, 21, 24, 26-28, 31 and 33-35 under 35 U.S.C. § 103(a) as being anticipated by *Mullins* in view of *Gong*, and in further view of *Lee*. Applicant respectfully traverses these rejections.

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Claim 1

Claim 1 recites a method of translating a request to access data from a first data

format to a second data format, which is recited in claim 1 as follows:

> 1. A method of translating a request to access data from a first data format to a
> second data format, comprising:
>
> receiving said request to access data for one or more attributes from a data store,
> said request including a filter for accessing the data of said one or more attributes;
>
> determining said data store from a plurality of data stores to service said request,
> wherein the plurality of data stores comprises a relational database and an LDAP
> directory [...]
>
> accessing a mapping catalog customizable for a relational database schema [...]
>
> translating at least a portion of said request from said first data format to a form
> suitable for said relational database [...]
>
> (Emphasis added)

The limitations recited in claim 1 are, in one embodiment, illustrated in Figures 4

and 6 of the Specification and further described in paragraphs 71-72 and 79 thereof.

In the Response to Remarks/Argument, the Examiner states:

> In addition, the Examiner notes that Mullins is directed to enhancing database
> access and performance when correlating or translating one database to another or
> to an object programming application. Similarly, the pending application is
> directed to translating data access requests. Both appear to be analogous art.
> (Office Action, p. 2-3) (Emphasis added)

Applicant respectfully disagrees that translating data requests, as disclosed in

claim 1, is analogous to translating one database to another, and submits that the method of

translating data requests from a first data format to a second data format, as disclosed in claim 1,

is not comparable to translating data from one database to another, as suggested in the Office

Action, for the reasons set forth below.

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Mullins "relates in general to enhancing database access and performance when correlating or translating one database to another database or to an object programming application." (Col. 1, lines 13-16) In particular, the Office Action cites col. 13, lines 9-18:

> In another embodiment the invention provides a system for <u>mapping from a first database format to a second database format, or from one database to another database of the same type</u>, as a way of transferring data or synchronizing data sources. The system includes: data in the first database format stored in the system; rules for translating from the first format to the second format stored as a separate structure from the data; and means for applying the rules to the data to obtain the second format. (Emphasis added)

This is different from claim 1 in which, in one embodiment, it is the <u>request</u> that includes attributes of a first data format, and it is the <u>request</u> (or portion thereof) that is translated from the first data format to a form suitable for a relational database. Although *Mullins* may teach "a system for mapping from a first database format to a second database format, or from one database to another database of the same type," nowhere does *Mullins* teach, disclose or suggest the translation of at least a portion of a data request from one data format to another suitable for a relational database.

Additionally, as described in the above excerpt, the rules in *Mullins* apply to translating <u>data</u> in a first database format to a second database format. That is, the rules apply to the data itself. As recited in claim 1, however, in one embodiment it is the <u>data request</u>, not the data in the database, which is translated in the mapping catalogues in the translation module. This is supported in the Specification, in one embodiment, in paragraph 79, lines 12-13.

Gong does not make up for this deficiency. To the best of the Applicant's understanding, *Gong* teaches a method for storing multi-value attributes in a relational database backing store, which involves profiling the data to determine how it may be optimally stored. However, as in the case of *Mullins*, nowhere in *Gong* is the translation of a data request taught or disclosed. Additionally, the Office Action cites *Gong* for teaching "determining a relational

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database from a plurality of data stores to service said request," and references Figure 4B and

col. 4, lines 45-67 in support thereof. Applicant respectfully disagrees that *Gong* teaches this

claim 1 limitation. While Figure 4B illustrates a collection of database servers, its purpose is to

merely show that a DB/2 client can connect to any database server to access directory

information, and that the collection of database servers forms a "single directory system image."

(Col. 4, line 63) In other words, neither Figure 4B nor col. 4, lines 45-67, nor any other

reference in *Gong* teaches determining a data store from a plurality of data stores to service a

data request, where determining the data store comprises identifying partitioning criteria to

associate a data type with each data store and evaluating the partitioning criteria against a filter,

all as recited in claim 1.

The Office Action next cites *Lee* for teaching that determining the relational

database from the plurality of data stores comprises comparing the filter for accessing the data of

the attributes to a partitioning expression for each of the data stores. In support of this position,

the Office Action quotes the following passages from *Lee*:

> With dynamic group management features, users can be automatically added or
> removed if they meet the criteria specified by the LDAP filter. (Paragraph 0111)

> ... the Identity System includes partition support for fat and flat tree directories
> using filters. From a configuration page, an atribute can be configured to be
> accessible (read, modify, etc.) based on a two part filter. The first component in
> the filter identifies a top node in the directory. The filter will only apply to those
> entities at or below that top node. The second component of the filter is an LDAP
> filter which defines who can access the attribute. This component filter can be
> applied on an attribute by attribute basis. (Paragraph 0148)

Lee, which is incorporated by reference into the Specification (see paragraph 1),

simply discloses technology to support multiple data stores. Applicant respectfully submits that

the quoted paragraphs in *Lee* are not the same as determining a data store from a plurality of data

stores to service a data request, comprising identifying partitioning criteria to associate a data

type with each data store and evaluating the partitioning criteria against a filter, all as recited in claim 1.

For these reasons, neither *Mullins*, *Gong*, nor *Lee*, individually or in combination, teaches or suggests all of the limitations of claim 1.

For a least the foregoing reasons, Applicant respectfully requests withdrawal of the rejection and allowance of claim 1 and claims 10-13, 21, 24, 26-28, 31 and 33-35. Independent claims 13, 21, 24 and 31 have substantially similar limitations, and accordingly Applicant respectfully requests the withdrawal of the rejections and allowance of claims 13, 21, 24 and 31.

35 U.S.C. § 103 Rejection, Mullins in view of Gong, in further view of Lee, and in view of Durand

The Office Action has rejected claims 2, 3, 5, 6, 14, 15, 17, 25, 29, 32 and 36 under 35 U.S.C. § 103(a) as being unpatentable over *Mullins* in view of *Gong*, in further view of *Lee*, and in view of *Durand*. Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 2, 3, 5, 6, 14, 15, 17, 25, 29, 32 and 36 each depend upon a base claim that is thought to be allowable as discussed in detail above.

35 U.S.C. § 103 Rejection, Mullins in view of Gong, in further view of Lee, and in further view of Bachmann

The Office Action has rejected claims 4, 16, 30, and 37 under 35 U.S.C. § 103(a) as being unpatentable over *Mullins* in view of *Gong*, in further view of *Lee*, and in further view of *Bachmann*. Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 4, 16, 30, and 37 each depend upon a base claim that is thought to be allowable as discussed in detail above.

35 U.S.C. § 103 Rejection, Mullins in view of Gong, in further view of Lee, and in further view of Shen

The Office Action has rejected claims 7-9 and 18-20 under 35 U.S.C.§103(a) as being unpatentable over *Mullins* in view of *Gong*, in further view of *Lee*, and in further view of *Shen*. Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 7-9 and 18-20 each depend upon a base claim that is thought to be allowable as discussed in detail above.

35 U.S.C. § 103 Rejection, Mullins in view of Gong, in further view of Lee, in further view of Durand, and in further view of Bachmann

The Office Action has rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over *Mullins* in view of *Gong*, in further view of *Lee*, in further view of *Durand*, and in further view of *Bachmann*. Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claim 22 depends upon a base claim that is thought to be allowable as discussed in detail above.

Claim 38

Applicant submits that new claim 38, which is dependent on claim 1, does not present any new subject matter. In one embodiment, support for claim 38 can be found in Figure 4 and paragraph 72 of the Specification. Applicant respectfully requests the allowance of claim 38 for at least the reasons that claim 1 is thought to be allowable as discussed in detail above.
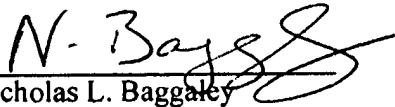
CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of

this application, please telephone the undersigned at 617-725-8953.

Respectfully submitted,

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